

Whitley, David

From: Marinda van Dalen <mvandalen@trla.org>
Sent: Monday, September 01, 2014 11:50 AM
To: Whitley, David
Cc: EXT rdoggett
Subject: Re: Notice to State of Wednesday's Witness List

David,
We will not be producing Mr. Taylor for deposition again. Texas has waived its objections to witnesses.
Thank you,
Marinda

On Sep 1, 2014, at 9:17 AM, "Whitley, David" <david.whitley@texasattorneygeneral.gov> wrote:

Marinda,

I have not heard from you on my e-mail from last night regarding Lenard Taylor. Lenard Taylor is listed below for Wednesday's witnesses. As you remember, at the end of his deposition, I made it clear that the deposition was ending against my wishes. Sometime before he testifies, he needs to sit for the remainder of his deposition in Corpus at Ben Donnell's office. If we can't come to an agreement on that by noon today, I will file either a motion to strike Lenard Taylor from the witness list or a motion to dismiss him as a plaintiff.

I'm available to discuss on my cell: 512.565.2747.

Thanks,
David

From: Rosenberg, Ezra [ezra.rosenberg@dechert.com]
Sent: Monday, September 01, 2014 8:08 AM
To: Scott, John; Clay, Reed; Wolf, Lindsey; Whitley, David; Roscetti, Jennifer
Cc: All Corpus Christi Section 2 Case Group; Dellheim, Richard (CRT); Westfall, Elizabeth (CRT); Freeman, Daniel (CRT); Baldwin, Anna (CRT); Maranzano, Jennifer (CRT); Gear, Bruce (CRT); King, Ryan (CRT)
Subject: Notice to State of Wednesday's Witness List

John et al – Here is our intended list for Wednesday. We listed the same additional transcript designations, as they would continue from day to day until we use them.

September 3:
Eulalio Mendez (Plaintiff)
Estela Espinoza (Plaintiff)
Yair Ghitza (Expert)
Matt Barreto (Expert)
Kristina Mora (voter assister)
Dawn White (social worker)
Buck Wood (Expert)
Gabriel Sanchez (Expert)
Leonard Taylor (Plaintiff)
Gordon Benjamin (Plaintiff)
Blake Green (League of Young Voters representative)

Phyllis Washington (Individual voter by video)

In addition, depending on whether there is time on either of the days, plaintiffs will begin to read in deposition/trial testimony depositions of the following witnesses:

Martin Golando (representative of MALC)

Linda Lydia (representative of Texas NAACP)

Yannis Banks (representative of Texas NAACP)

Juanita Cox (representative of LUPE)

Ruby Barber (Individual voter)

Jim Denton (Individual voter)

Vera Trotter (Individual voter)

Sen. Wendy Davis

Sen. Troy Fraser

Janice McCoy (legislative staff)

Brian Hebert (legislative staff)

Speaker Joe Straus

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